

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: AVERY JAMES JENKINS

CASE NO. 22-02336-JAW
CHAPTER 13

OBJECTION TO MOTION TO ALLOW PAYMENT ARREARAGE (Dkt. #62)

Comes now, Trustmark National Bank hereinafter Respondent and files this their objection to the Debtor's Motion to Allow Payment Arrearage (Dkt. #62) and in support of same would show the following:

1. Trustmark National Bank is a secured creditor herein. Debtors' motion does not account for the status of the extra money not paid to the Trustee which caused the arrearage or why it cannot be used to pay / cure the post petition delinquency. Any and all agreeing of modification as proposed will not afford adequate protection to Trustmark National Bank; and therefore the Motion as filed should be denied.

Wherefore premises considered Trustmark National Bank requests that the motion be denied.

This the 6th day of July, 2023.

Trustmark National Bank

/s James Eldred Renfroe

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Certificate of Service

I certify that I have this day mailed a true and correct copy of the foregoing Response to and served via efilng:

Avery James Jenkins
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Hon. Thomas Carl Rollins, Jr.
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Hon. David Culver Rawlings
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US Trustee
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Dated: July 6, 2023

/s James Eldred Renfroe
James Eldred Renfroe